

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KALLEMEYN COLLISION CENTER, INC., )  
directly and as assignee of Kevin Karl and Jennifer )  
Karl, and JEFF KALLEMEYN, individually, )

Plaintiffs,

V.

THE STANDARD FIRE INSURANCE  
COMPANY, and THE TRAVELERS  
INDEMNITY COMPANY,

Defendants.

Case No. 1:21-cv-6004

**NOTICE OF REMOVAL OF  
ACTION UNDER 28 U.S.C. §1441  
(Diversity Jurisdiction)**

CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
FIFTH MUNICIPAL DISTRICT  
CASE NO. 2021 L 065089

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants, THE STANDARD FIRE INSURANCE COMPANY (“Standard Fire”) and THE TRAVELERS INDEMNITY COMPANY (“Travelers Indemnity”), by and through their attorneys, pursuant to 28 U.S.C. §§ 1332, 1441(a) and 1446, hereby remove to this Court the state court action described below:

1. On or about September 29, 2021, Plaintiffs, KALLEMEYN COLLISION CENTER, INC. (“Kallemeyn Collision”) and JEFF KALLEMEYN (“Kallemeyn”), filed an action in the Circuit Court of Cook County, Illinois, Fifth Municipal District, under Case No. 2021 L 065089, against Defendants Standard Fire and Travelers Indemnity. Plaintiffs’ Complaint for Breach of Contract, Disparagement, and Other Relief (the “Complaint”) is attached hereto as Exhibit A and incorporated herein by reference.

2. On or after October 12, 2021, Standard Fire and Travelers Indemnity were served with a copy of Plaintiffs' Complaint.

3. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b)(1) and (2)(B) as it is filed within thirty (30) days after Standard Fire's and Travelers Indemnity's receipt of Plaintiffs' Complaint on or after October 12, 2021.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332 and is one which may be removed to this Court by Standard Fire and Travelers Indemnity pursuant to the provisions of 28 U.S.C. § 1441 in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

5. At the time the Complaint was filed, and at all times subsequent thereto, Plaintiff Kallemeyn Collision was and is an Illinois corporation with its principal place of business in the State of Illinois.

6. At the time the Complaint was filed, and at all times subsequent thereto, Plaintiff Kallemeyn was and is a citizen of the State of Illinois.

7. At the time the Complaint was filed, and at all times subsequent thereto, Defendant Standard Fire was and is a Connecticut corporation with its principal place of business in the State of Connecticut.

8. At the time the Complaint was filed, and at all times subsequent thereto, Defendant Travelers Indemnity was and is a Connecticut corporation with its principal place of business in the State of Connecticut.

9. Pursuant to Plaintiffs' Complaint, the amount in controversy exceeds \$100,000.

WHEREFORE, Defendants, THE STANDARD FIRE INSURANCE COMPANY and THE TRAVELERS INDEMNITY COMPANY, pray that the above-entitled cause, currently pending in the Circuit Court of Cook County, Illinois, Fifth Municipal District, under Case No.

2021 L 065089, be removed therefrom to the United States District Court for the Northern District of Illinois and that this cause proceed in this Court as an action properly removed thereto.

Respectfully submitted,

/s/ Thomas B. Orlando

Thomas B. Orlando  
FORAN GLENNON PALANDECH  
PONZI & RUDLOFF PC  
222 N. LaSalle Street, Suite 1400  
Chicago, IL 60601  
312.863.5000  
312.863.5099/fax  
[torlando@fgppr.com](mailto:torlando@fgppr.com)

Attorney for Defendants,  
THE STANDARD FIRE INSURANCE  
COMPANY and THE TRAVELERS INDEMNITY  
COMPANY

**CERTIFICATE OF SERVICE**

I, the undersigned, on oath, subject to penalty of perjury, state that I served the *Notice of Removal* and *Appearance*, by emailing a copy to all counsel of record, at the address set forth below on November 9, 2021.

Patrick J. McGuire  
Law Offices of Patrick J. McGuire, P.C.  
119 S. Emerson Street, Suite 192  
Mt. Prospect, IL 60056  
[patrick.mcguire@pjmlegal.com](mailto:patrick.mcguire@pjmlegal.com)

/s/ Thomas B. Orlando  
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Thomas B. Orlando  
FORAN GLENNON PALANDECH  
PONZI & RUDLOFF PC  
222 N. LaSalle Street, Suite 1400  
Chicago, IL 60601  
312.863.5000  
312.863.5099/fax  
[torlando@fgppr.com](mailto:torlando@fgppr.com)